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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
	)	
	)	
Access Charge Reform	)	CC Docket No. 96-262
	)	

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), on behalf of its local, long distance and wireless divisions, submits its replies to comments filed on July 23, 1999 in the above-captioned matter.

INTRODUCTION

The issues staked out in the comments have, for the most part, been discussed, debated and dissected from every conceivable angle. Sprint shall, therefore, limit its replies to a very few comments that it believes go completely beyond the pale.

Sprint first reiterates its position on the most basic issues being considered by the Commission:

1. Sprint believes that it is imperative, in order to preserve competitive neutrality, that the Commission expressly order that local exchange companies are prohibited from recovering universal service fund ('USF") contributions through carrier access charges.

2. Sprint advises against the inclusion of wireless lines when determining a state's ability to support universal service. Wireless costs were not considered in determining the national benchmark and thus it is inappropriate to include them when assessing a state's ability to support universal service. The Commission should not take any action that would prejudge the states' decisions on the inclusion of wireless carriers as universal service contributors. It should thus reject the notion of including wireless lines when determining a state's ability to support universal service.

3. It is vital that hold harmless be implemented as part of the federal plan. It is critical that the Commission use as a starting point existing levels of funding in order to ensure continued support to high-cost areas. Furthermore, because it is quite likely that the cost model will not be flawless upon its introduction on January 1st, it is necessary that hold harmless be in place on that date. Its mere presence will lessen significantly any concern regarding the readiness of the model. Sprint agrees that the Commission should revisit the issue in three years, once concerns about the stability of the cost model and inputs have been alleviated.

4. As Sprint has argued consistently in this docket, it is imperative that any ILEC receiving an increase in universal service support funds above its current funding levels must be required to offset that increase, dollar for dollar, though decreases in intrastate access charges.

5. The Commission should reject entirely the concept of block grants. The decision regarding the distribution of USF dollars must be made prior to the disbursement of the fund and not be left to a matter discretion after the fact. Neither the Act nor its legislative history contain any evidence to suggest that Congress intended a change in the manner in which USF dollars are dispensed. Funds should be directed to the relevant carrier based on the supported services provided by that carrier.

6. The Commission should calculate cost on the basis of wire center boundaries. Computing costs on a study area basis, as the Joint Board has suggested, results in little more than maintaining the status quo. Use of the wire center is the right answer for universal service because it allows support to be targeted. It also is the right answer for competition since it removes barriers to entry in high cost areas. Moreover, measuring cost at the wire center ensures that competition will not erode needed subsidies in high cost areas.

7. In an effort to assist the Commission in maintaining a federal fund that is not materially larger than the existing universal service fund while, at the same time, calculating costs based on wire centers, Sprint proposes a three-stepped plan. First, federal support should be available only for wire centers whose costs are 150% or greater than the nationwide average cost per line. Second, initially, only 37.5% of the costs exceeding that threshold should be eligible for federal support. Finally, states will be responsible for funding their internal universal service needs up to an amount equivalent to $1.00 per access line per month. That is, federal universal service support will be available to companies in a state only to the extent that the support need defined in step 2 above exceeds the amount a state could raise through a $1.00 monthly charge per access line.

8. Finally, Sprint asserts that certain adjustments to the access charge regime are necessary. In short, interstate access charges must be rebalanced targeting specifically those rates that are now above costs (i.e. traffic sensitive rates). Implicit subsidies must be removed; if done in conjunction with rebalancing, removing these subsidies will minimize the overall size of the universal service fund.

I. THE ACT REQUIRES THE REMOVAL OF IMPLICIT SUBSIDIES

At pages 9 and 10 of its comments, Bell Atlantic charges that "... the terms that were adopted in section 254 do not require elimination of all implicit subsidies or even all implicit subsidies in interstate rates as suggested in the Notice (¶126)... There is no free-floating command in section 254 to remove all implicit subsidies from rates or to make all subsidies explicit." These statements reveal that Bell Atlantic's reading of Section 254, as well as its view of market realities, is severely skewed.

Sprint asserts that an attempt to foster universal service objectives through implicit cross subsidies (e.g., of local service rates by access or toll rates) clearly runs afoul of Section 254(e). Moreover, to the extent that such implicit subsidies give incumbent local exchange carriers ("ILECs") an edge over potential entrants (e.g., by permitting – indeed requiring – them to charge below-cost rates for local service), they also constitute a barrier to entry that is precluded by Section 253 of the Act. It may be painful to replace hidden subsidies with explicit USF support programs, but it is nonetheless required both by Section 254 and by the broader policy goal of fostering competition in all telecommunications services.

Sprint will not attempt to theorize just why Bell Atlantic stakes out such an extreme position on this point. Whatever its theory, the recently released decision of the 5th Circuit Court of Appeals reaffirmed Section 254's mandate, with the Court noting that it was "... convinced that the plain language of Section 254(e) does not permit the FCC to maintain *any* implicit subsidies for universal service support."[1] (emphasis in original). Importantly, the U.S. Supreme Court, referring to implicit subsidies of universal service in local rates subject

[1] *Texas Office of Pub. Util. Counsel v. FCC*, No. 97-60421 (5th Cir., July 30, 1999) (1999 U.S. App. LEXIS 17941).

to state jurisdiction, has also stated that " Section 254 requires that universal-service subsidies be phased out... ."[2]

To the extent that Bell Atlantic does not find the directive contained in Section 254(e) explicit enough to address with certainty its concerns about the need to eliminate *all* implicit subsidies, Sprint asserts that the recent court opinions cited above should provide that certainty. The Commission must, accordingly dismiss Bell Atlantic's comments on this issue.

II. IT IS APPROPRIATE FOR THE COMMISSION TO ADOPT HOLD HARMLESS

There is no clear consensus among the commenters on the question of the implementation of a hold harmless provision as part of the federal universal service mechanism. Sprint continues to believe that no carrier or state should received less explicit federal high cost support than it receives today. The overwhelming majority of carriers that are high-cost companies today will continue to be high-cost companies following the implementation of the new USF methodology. Consequently, there is no reason – nor was any valid reason supplied by those commenters opposed to hold harmless - to subject these carriers to unnecessary harm during the transition period. Sprint again maintains that the Commission must adopt a hold harmless provision and distribute the funds on a carrier basis.

The reasons offered in opposition to a hold harmless provision ranged from the predictable to the perplexing. In many cases, the reason is transparent, such as the case with those carriers hoping merely to harm high cost incumbents LECs. In certain other cases, commenters do not oppose the concept of hold harmless, but fear that offering hold

[2] AT&T Corp. v. Iowa Utilities Bd., 119 S.Ct. 721, 737 (1999).

harmless on a carrier basis, as Sprint supports, will increase the size of the fund. In fact, that is not the case. Sprint has analyzed the differences between implementing hold harmless on a carrier and a state basis and finds that there is virtually no variation between the two with respect to the impact on fund size. The following table illustrates the difference in the overall size of the federal fund when hold harmless is calculated at a carrier v. state level:

Costs Calculated at...	Cost Benchmark	State Contribution, $ Amount Per Line Per Month	Difference in Fund Size: Hold Harmless by State or by Carrier
Study Area	115%	$0	0.4%
Study Area	115%	$1	0.2%
Study Area	115%	$2	0.4%
Study Area	130%	$0	1%
Study Area	130%	$1	0.6%
Study Area	130%	$2	0.8%
Study Area	150%	$0	1.7%
Study Area	150%	$1	1.5%
Study Area	150%	$2	3.8%
Wire Center	115%	$0	0.1%
Wire Center	115%	$1	0.0%
Wire Center	115%	$2	0.1%
Wire Center	130%	$0	0.2%
Wire Center	130%	$1	0.1%
Wire Center	130%	$2	0.1%
Wire Center	150%	$0	0.2%
Wire Center	150%	$1	0.1%
Wire Center	150%	$2	0.2%

As reflected above, in every scenario (using the Joint Board's proposed range of cost benchmarks) the difference in the overall fund size as a result of the adoption of hold harmless at the carrier v. state level is negligible, and in any event always under 5% - and in most cases well under 2%. In fact, in only one scenario is the difference greater than 2% (3.8%).

Because there is no discernable difference, and because of the clear benefits that attend distribution of universal service funds directly to the carriers - chief among them the

ability to ensure that federal funds will go to targeted high-cost areas - the Commission should dismiss entirely the notion of disbursing hold harmless funds on a state basis.

Other commenters, such as the New York Department of Public Service, have clearly lost sight of the overall benefit of hold harmless. While rejecting completely the notion of a hold harmless proviso, New York, at the same time, is concerned that this Commission's proxy model is going to produce skewed results thus causing upheaval in universal service funding (at pages 3-5). What New York fails to see is that it is precisely because the model will not, in all likelihood, be in perfect form upon its introduction that hold harmless is crucial. As Sprint noted in its initial comments, the adoption of carrier-specific hold harmless diminishes significantly any concern regarding the model's readiness. The carrier-specific hold harmless will guarantee that support continues to flow to targeted high-cost areas, regardless of how long it takes to perfect the model and its inputs. Because it is not likely that the model will be flawless on January 1, 2000, the adoption of hold harmless is absolutely critical to the new universal service methodology. However, Sprint is not suggesting it would be inappropriate to remove hold harmless at some point in the future. Sprint agrees with the Commission's stated intent to review the provision in three years, assuming of course, that concerns about the stability of the cost model and inputs have been alleviated.

III. THERE IS NO SUPPORT FOR THE RECOMMENDATION THAT THE SLC BE REDUCED OR ELIMINATED.

Claiming that residential and single line business customers pay too great a share of the joint and common costs of interstate access, the state members of the Joint Board have recommended that the subscriber line charge ("SLC") be reduced or eliminated (at page 2). Similarly, in comments submitted jointly on behalf of the Texas Office of Public Utility Counsel, the Consumer Federation of America, the National Association of State Utility

Consumer Advocates, and the Consumers Union, it is also suggested that the SLC be eliminated. These commenters each reason that the loop is a joint and common facility and as such, its associated costs should be recovered not just through the SLC – which they claim carries too much of the burden currently - but from the IXCs through increases in either the carrier common line charge ("CCLC") or the primary interexchange carrier charge ("PICC").

Sprint asserts that the very foundation upon which these commenters base their arguments is seriously flawed. The loop is ***not*** a joint and common cost nor, as these commenters claim, has this Commission determined that it is. The fact is there is a cost associated with providing the loop and that cost does not vary based on what the customer does with the loop. Consequently, how the customer uses the loop – whether for local or long distance calling – does not impact how the cost of the loop should be recovered. The commenters rationalize that because it is impossible to place a long distance call without use of the loop, the carriers benefit from the loop and thus should pay for the costs associated with the loop. However, like arguments can be made that show just how unsound this seemingly simple argument is. Is it not impossible to watch programming offered by cable television without the benefit of a television set? Yet, no one would suggest that the cost of the set be included in basic cable rates. The point of course, is that the fact that an end user requires a certain device in order to utilize a service does not mean that it is either logical or efficient to include the cost of that device in the cost of the service.

The cost of the loop is a non-traffic sensitive cost and, therefore, Sprint asserts that it should be recovered on a flat-rate basis. Although the creation of the PICC was a positive step in transitioning carrier recovery to a flat rate, it is more appropriate to view the SLC as the correct flat-rate recovery mechanism for the loop. If the Commission is inclined to

make adjustments to the SLC at all, it should follow the advice of Sprint and others in this matter and deaverage the SLC rate.

These commenters are attempting to reverse completely the Commission's direction with respect to the recovery of interstate costs. The Commission must not move backwards on these important issues. On July 29, 1999, the Coalition for Affordable Local and Long Distance Service filed with the Commission a proposal for the reform of interstate access charges, including the SLC, CCLC and the PICC. As a result of the Coalition's filing, the Commission will have the opportunity to discuss these matters in greater detail. It should take that opportunity to declare, once and for all, that the loop is not a joint and common cost and move to an appropriate flat-rate recovery mechanism for costs associated with the loop.

IV. THE COMMISSION SHOULD REJECT AT&T'S PROPOSAL

At page 14 of its comments, AT&T makes a rather curious – and not well-reasoned - proposal. First, it avers that "... carriers should be required to notify their customers that the ILEC has received federal support for their line and that such support is portable to the carrier of the customer's choice." Next, it would require state commissions to "... demonstrate to the FCC that to the extent that carriers within the state have received incremental high-cost support amounts under the new federal forward-looking support mechanism that these funds are being used to reduce local rates... If a state fails to make this showing, the FCC should reduce interstate access charges by the residual amount."

While it is Sprint's policy to provide the customer with all the information he/she requires in order to make informed choices about telecommunications services, it fails to see how AT&T's suggestion will provide anything but mass customer confusion. While, on its face, AT&T's proposal appears to be customer friendly, in fact, such a notice would provide

the customer with little usable information – though it could certainly result in misunderstandings and consumer backlash – which is, perhaps AT&T's goal. Sprint suspects that, in reality, the idea for the notice is little more than a veiled attempt by AT&T to garner free advertising for its own local services at the expense of the incumbent providers.

From a practical perspective, there are numerous flaws in AT&T's proposal. First, it is not clear which "carriers" are to provide this suggested notice, but Sprint must assume that "all" carriers includes IXCs, CLECs, ILECs and CMRS providers. To the extent the CLEC and CMRS carriers are eligible carriers and have won the customer, however, it is they, not the ILEC, that will be receiving the universal service support. Moreover, why an IXC should be required to provide this type of notice is not at all clear.

Sprint is also puzzled by AT&T's incorrect assumption that universal service support is to be used to reduce local rates. The Commission has not made such a finding. What the Commission has said on the subject is this: local rates, as they currently exist, are affordable[3]. Likewise, the Joint Board, on which members of state commissions serve, has made the same declaration[4]. Because local rates are affordable, it makes no sense to use limited universal service funds to reduce them further. It is, however, logical to use USF support to replace the implicit subsidies currently residing in access rates. As Sprint noted in its initial comments in the instant matter, the Commission has recognized that the implicit subsidies that currently exist in intrastate access charges are used to support today's universal service efforts. Consequently, with the implementation of the new USF mechanism, to the extent a

[3] *Federal-State Joint Board on Universal Service*, Seventh Report & Order and Thirteenth Order on Reconsideration in CC Docket No. 96-45; Fourth Report &Order in CC Docket No. 96-262 and Further Notice of Proposed Rulemaking, FCC 99-119 (rel. May 28, 1999) at ¶38.

[4] *Federal-State Joint Board on Universal Service, Second Recommended Decision*, CC Docket 96-45, (rel. November 23, 1998) at ¶15.

carrier receives support in excess of its current levels of support, it should be required to offset that increase, dollar for dollar, through decreases in intrastate access charges. Failure to take this essential step – or to follow AT&T's ill-advised scheme - would allow the implicit subsides already residing in intrastate access to remain in place. And, as noted above, Section 254(e) requires *all* implicit subsides to be eliminated.

AT&T's proposed plan has no merit and no support from other commenters. The Commission should dismiss AT&T's comments without further consideration.

Respectfully submitted,
SPRINT CORPORATION

By _____ for
Jay C. Keithley
Leon Kestenbaum
1850 M Street N.W., 11th Floor
Washington, DC 20036-5807
(202) 857-1030

Sandra K. Williams
4220 Shawnee Mission Parkway
Suite 303A
Westwood, KS 66205
(913) 624-1200

Jonathan Chambers
Sprint PCS
1801 K Street N.W., Suite M112
Washington, D.C. 20006
(202) 835-3617

Its Attorneys

August 6, 1999

CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 6th day of August 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation," In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Access Charge Reform, CC Docket. 96-262, filed this date with the Secretary, Federal Communications Commission, and to the persons on attached list.

Joyce Y. Walker

Chairman William Kennard
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

Commissioner Susan Ness
Federal Communications Commission
445-12th Street, SW
Room 8-B115
Washington, DC 20554

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445-12th Street, SW
Room 8-B302
Washington, DC 20554

Commissioner Michael Powell
Federal Communications Commission
445-12th Street, SW
Room 8-B204
Washington, DC 20554

Commissioner Gloria Tristani
Federal Communications Commission
445-12th Street, SW
Room 8-C302
Washington, DC 20554

The Honorable David Baker
Georgia PSC
244 Washington Street, NW
Atlanta, GA 30334

Tom Boasberg
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

Ann Dean
Maryland PSC
Six Paul Street
16th Floor
Baltimore, MD 21202

Rowland Curry
Texas PUC
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78701

Bridget Duff
Florida PSC
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Emily Hoffnar
Federal Communications Commission
445 12th Street S.W. 6th Floor
Washington, DC 20554

Paul Gallant
Federal Communications Commission
445-12th Street, SW 8th Floor
Washington, DC 20554

Timothy Peterson
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Thor Nelson
Colorado Office of Consumer Counsel
1580 Logan Street
Suite 610
Denver, CO 80203

Tiane Sommer
Georgia PSC
244 Washington Street, SW
Atlanta, GA 30334

Sheryl Todd (3 copies)
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

The Honorable Julia Johnson
Chairman
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

The Honorable Kenneth McClure
Missouri Public Service Commission
301 W. High Street
Suite 530
Jefferson City, MO 65102

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilities Commission
500 E. Capital Avenue
Pierre, SD 57501

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Harry S. Truman Building
Room 250
Jefferson City, MO 65102

Lisa Boehley
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20036

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium
1200 N Street
Lincoln, NE 68509

Charles Bolle
South Dakota Public Utilities Commission
State Capital - 500 E. Capital Avenue
Pierre, SD 57501

John Clark
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Bryan Clopton
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Irene Flannery
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

L. Charles Keller
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Lori Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue
Suite 400
Anchorage, AK 99501

David Krech
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Mark Long
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399

Robert Loube
Federal Communications Commission
445 12th Street S.W, 6th loor
Washington, DC 20554

Arthur H. Stuenkel
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AK 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place - Fifth Floor
Harrisburg, PA 17101

Kevin Martin
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

Michael A. McRae
DC Office of People's Counsel
1133 15th Street, NW
Suite 500
Washington, DC 20005

Joel Ader
Telecordia Technologies
710 L'Enfant Plaza S.W.,
Promenade Level, East Building
Washington, D.C. 20024

Terry Monroe
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

Mark Nadel
Federal Communications Commission
445-12th Street, SW 6th Floor
Washington, DC 20554

Kimberly Parker
Barry Payne
Indiana Office of Consumer Counsel
100 North Senate Ave., Room N501
Indianapolis, IN 46204-2208

Tejal Mehtu
Federal Communications Commission
445 12TH Street SW 5th Floor
Washington, DC 20554

Paul Rodgers
Charles D. Gray
James Bradford Ramsey
NARUC
1102 ICC Building - P.O. Box 684
Washington, DC 20044

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Gary Seigel
Federal Communications Commission
445 12TH Street SW 5th Floor
Washington, DC 20554

Richard Smith
Federal Communications Commission
445 12TH Street SW 5th Floor
Washington, DC 20554

Lori Wright
Federal Communications Commission
445 12TH Street SW 5th Floor
Washington, DC 20554

Lawrence C. St. Blanc
Gayle T. Kellner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821

Kenneth Sofferahn
James A. Burg
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Karen Finstad Hammel
Montana PSC
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59601

Governor William J. Janklow
State of South Dakota
State Capitol
500 East Capitol
Pierre, SD 57501

Adrienne G. Southgate
State of Rhode Island and Providence Plantations
Public Utilities Commission
100 Orange Street
Providence, RI 02903

Edward H. Salmon
State of New Jersey Board of Public Utilities
CN-350
Trenton, NJ 08625

Kathleen F. O'Reilly
The Michigan Consumer Federation, etal
414 A Street, SE
Washington, DC 20003

Kent Nilsson
Federal Communications Commission
445-12th Street S.W.
Washington, DC 20554

Virginia J. Taylor
Richard A. Elbrecht
California Department of Consumer Affairs
400 R Street
Suite 3090
Sacramento, CA 95814

Amy E. Dougherty
Kentucky PSC
P.O. Box 615
Frankfort, KY 40602

Donald L. Howell, II
Idaho PUC
P.O. Box 83720
Boise, ID 83720

Mary J. Sisak
Mary L. Brown
MCI WorldTeleComm., Inc.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

John G. Strand
John C. Shea
State of Michigan PSC
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Gayle T. Killner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821

ITS
1231-20th Street, NW, Ground Level
Washington, DC 20036

Stephen G. Oxley
Wyoming PSC
700 West 21st Street
Cheyenne, WY 82002

Cynthia B. Miller
State of Florida PSC
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Kathryn Marie Krause
Dan L. Poole
U S WEST, Inc..
1020 19th Street, NW
Suite 700
Washington, DC 20036

Joel B. Shifman
Maine PSC
242 State Street
Augusta, ME 04333

Michael Gallagher
New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ 07120

Richard McKenna, HQE03J36
GTE
P.O. Box 152092
Irving, TX 75015

Dan Morales
Jorge Vega
Thomas P. Perkins
Consumer Protection Division
P.O. Box 12548, Capitol Station
Austin, TX 78711

Alyce H. Hanley
Alaska PUC
1016 West 6th Avenue
Suite 400
Anchorage, AK 99501

Joel Blau
Ann Kutter
NYS Consumer Protection Board
Five Empire State Plaza
Suite 2101
Albany, NY 12223

Robert S. Tongren
David C. Bergmann
Office of the Consumers' Counsel - State of Ohio
77 South High Street
15th Floor
Columbus, OH 43266

Billy Jack Gregg
Terry D. Blackwood
West Virginia PSC
700 Union Building
723 Kanawha Boulevard - East
Charleston, WVA 25301

Richard A. Askoff
Donna A. DiMartino
NECA
100 South Jefferson Road
Whippany, NJ 07981

Lawrence E. Sarjeant
Porter Childers
USTA
1401 H Street, NW - Suite 00
Washington, DC 200

Gail L. Polivy
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Michael J. Karson
Ameritech
2000 West Ameritech Center Drive
Room 4H84
Hoffman Estates, IL 60196

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
State of California and the PUC of California
505 Van Ness Avenue
San Francisco, CA 94102

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications Industry Assn.
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

L. Marie Guillory
NTCA
2626 Pennsylvania Avenue, NW
Washington, DC 20036

James Gattuso
Wayne A. Leighton
Citizens for a Sound Economy Foundation
1250 H Street, NW
Washington, DC 20005

Eric B. White
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

B.B. Knowles
Georgia PSC
244 Washington Street, SW
Atlanta, GA 30334

M. Robert Sutherland
Richard M. Sbaratta
Rebecca M. Lough
BellSouth
1155 Peachtree Street, NE - Suite 1700
Atlanta, GA 30375

Henry Geller
Samuel A. Simon
Alliance for Public Technology
901 15th Street, NW
Suite 230
Washington, DC 20005

David Beckett
Colorado PUC
1580 Logan Street - OL -2
Denver, CO 80203

William H. Smith
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Commissioner Rod Johnson
Nebraska PSC
300 The Atrium
1200 N Street
P.O. Box 94927
Lincoln, NE 68509

Illona A. Jeffcoat-Sacco
North Dakota PSC
600 E. Boulevard
Bismarck, ND 58505

William J. Janklow
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Kenneth Stofferahn
James A. Burg
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Pat Wood, III
Robert W. Gee
Judy Walsh
Steve Davis
Texas PUC
1701 North Congress Avenue - P.O. Box 13326
Austin, TX 78701

Mary E. Newmeyer
Alabama PSC
P.O. Box 991
Montgomery, AL 36101

Mark Cooper
Gene Kimmelman
Consumer Federation of America
1424 16th Street, NW - Suite 604
Washington, DC 20036

R. Glenn Rhyne
South Carolina PSC
P.O. Drawer 11649
Columbia SC 29211

Robert M. Lynch
Durward D. Dupre
Michael J. Zpevak
Southwestern Bell Telephone Co.
One Bell Center - Room 3524
St. Louis, MO 63101

Maureen O. Helmer
Penny B. Rubin
John Starrs
PSC of NY
Three Empire State Plaza
Albany, NY 12223

John W. Katz
Office of the State of Alaska
444 North Capitol Street, NW
Suite 336
Washington, DC 20001

David W. McGann
Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Betty D. Montgomery
Duane W. Luckey
Steven T. Nourse
PUC of Ohio
180 East Broad Street
Columbus, OH 43266

Joseph K. Witmer
Pennsylvania PUC
P.O. Box 3265
Harrisburg, PA 17120

Roger Hamilton
Ron Eachus
Joan H. Smith
Oregon PUC - Justice Building
550 Capitol Street, NE
Salem, OR 97310

Sandra Mattavous-Frye
Office of the People's Counsel of DC
1133 15th Street, NW
Suite 575
Washington, DC 20005

John F. Mortell
G. Richard Klein
David E. Ziegner
Indiana Utility Regulatory Commission
302 West Washington - Suite E306
Indianapolis, IN 46204

Lawrence W. Katz
Edward D. Young, III
Michael E. Glover
Bell Atlantic
1320 North Court House Road - Eighth Floor
Arlington, VA 22201

Katherine G. Grincewich
US Catholic Conference
Office of the General Counsel
3211 4th Street, NE
Washington, DC 20017

Anne U. MacClintock
SNET
227 Church Street - Suite 1500
New Haven, CT 06510

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
NCTA
1724 Massachusetts Avenue, NW
Washington, DC 20036

Barbara S. Wellbery
Chief Counsel
U.S. Department of Commerce RM. 4713
14th St. & Constitution Ave., N.W.
Washington, D.C. 20230

Maureen O. Helmer
New York State Department of Public Services
Three Empire State Plaza
Albany, New York 12223-1350

Robert L. Goggarth
Mark J. Golden
PCIA
500 Montgomery St.
Suite 700
Alexandria, VA 22314-1561

Emily C. Hewitt
General Services Administration
18th & F St., NW., Rm. 4002
Washington, DC 20405

Peter Arth, Jr.
California PUC
505 Van Ness Ave.
San Francisco, CA 94102

David L. Meier
Cincinnati Bell Telephone
201 E. 4th St.
P.O. Box 2301
Cincinnati, OH 45201-2301

Jim Hart
Office of Consumer Affairs
Consumers' Utility Counsel Division
#2 Dr. M.L. King, Jr. Drive
Plaza Level, East Tower
Atlanta, GA 30334

Michael L. Ginsberg
Utah Public Service Commission & Utah DPU
160 E. 300 South
Box 146751
Salt Lake City, UT 84114-6751

Linda Nelson
Florida Department of Management Services
4050 Esplanade Way
Tallahassee, FL 32399

Carrol S. Verosky
Wyoming PSC
700 West 21st Street
Cheyenne, WY 82002

Peter H. Jacoby
AT&T
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Bruce Burcat
Delaware PSC
861 Silver Lake Blvd.
Cannon Building - Suite 100
Dover, DE 19904